



FAX COVER SHEET

TO Hon. Gabriel W. Gorenstein

COMPANY United States Magistrate Judge

FAXNUMBER 12128054060

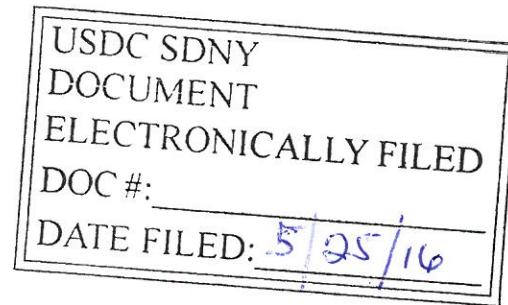
FROM Neil B. Checkman

DATE 2016-05-25 15:48:07 GMT

RE Letter requesting additional time for suretor to sign PRB

COVER MESSAGE

Dear Judge Gorenstein: Attached please find my unopposed request for additional time to have a FRP sign the PRB for my client.



115 Broadway, Suite 1704
New York, NY 10006
212.261.9940
Fax: 212.899.1187
neilg@checkmanlaw.com

www.checkmanlaw.com
www.whitecollarcrimesnyc.com

LAW OFFICES OF NEIL B. CHECKMAN, ESQ.

May 25, 2016

Hon. Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
By Facsimile

16 CR 371

Re: United States v. Michelle Morton, et al.,
16 Mag. 2978

Dear Judge Gorenstein:

I am the attorney assigned pursuant to the Criminal Justice Act to represent Michelle Morton on the above-referenced complaint. On May 11, 2016, Ms. Morton was presented before the Hon. Ronald Ellis and was released on a PRB of \$250,000 dollars to be secured by her own signature and that of her father and one additional Financially Responsible Person. Her travel was limited to the SDNY, the EDNY and the District of New Jersey, where she resides with her parents. In addition, her Passport was in the custody of the arresting agents and she was not to apply for travel documents.

Ms. Morton was released that evening on her own signature and subsequently her father came in and signed the bond. Judge Ellis granted Ms. Morton two weeks to obtain a co-signor however that time period will expire today. Ms. Morton is still in the process of finding a FRP to co-sign the bond, but will require an additional seven business days to get the bond co-signed.

Counsel has spoken with A.U.S.A. Brian Blaise and he informs that the Government has no objection to this application for additional time. Accordingly, counsel requests that Ms. Morton be given until the close of business on Monday, June 6, 2016 to have a FRP sign the bond.

Hon. Gabriel W. Gorenstein
May 25, 2016
Page 2

We thank the Court for considering this application.

Very truly yours,

Neil B. Checkman

Neil B. Checkman

/NBC

cc: A.U.S.A. Brian Blaise (By e-mail)
Ms. Michelle Morton (Telephonically)

Application granted.

So ordered.

Dan L. CWT

JSMT

5/25/16